

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Stiles Incorporated  
23551 Cooper Drive  
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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|---|----------------|
| Operation Permit No.: T039-7432-00282   |                |
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: |

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary wood molding and surface coating operation.

Responsible Official: **David L. Gawthrop, Treasurer**  
Source Address: **23551 Cooper Drive, Elkhart, IN 46514**  
Mailing Address: **P.O. Box 1807, Elkhart, IN 46515**  
Telephone Number: **219-262-3671**  
SIC Code: **2499**  
County Location: **Elkhart**  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) A woodworking shop, identified as EU-01, equipped with three (3) baghouse dust collectors identified as CD-01, CD-02, and CD-03 for particulate control, exhausting through Stacks D1, D2, and D3.
- (b) A wood surface coating operation, identified as EU-02, including the following:
  - (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
  - (2) One (1) solvent stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack F1;
  - (3) One (1) fan coater application system, identified as FE-4, exhausting through Stack F4;
  - (4) One (1) Paint O'Matic machine using a vacuum coating system, identified as FE-5, exhausting through Stack F5;
  - (5) Two conveyor systems: one (1) conveyor servicing the Paint O'Matic, waterbased stainer, and fancoater, exhausting through Stacks F5 and FC6; the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3;
  - (6) Two (2) UV coaters using vacuum coating systems, identified as FE7 and FE9, exhausting through Stacks F7.1, F7.2, F9.1, F9.2, and F9.3;

- (7) One (1) waterbased stainer using air-assisted airless spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack F8.
- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) cyclone identified as C3 for particulate control, exhausting through Stack B1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for

modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590



- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967.
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within two (2) working days of the time when emission limitations were exceeded due to the emergency.  
  
The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:
    - (A) A description of the emergency;
    - (B) Any steps taken to mitigate the emissions; and
    - (C) Corrective actions taken.  
The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
  - (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to

this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
  - (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

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**B.22 Operational Flexibility [326 IAC 2-7-20]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this



permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

## SECTION C SOURCE OPERATION CONDITIONS

|               |
|---------------|
| Entire Source |
|---------------|

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]  
(a) Notification requirements apply to each owner or operator. If the combined amount of

regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source

Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the

parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.14 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 10, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be

an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for



purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(do) not require the

certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.24 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) A woodworking shop, identified as EU-01, equipped with three (3) baghouse dust collectors identified as CD-01, CD-02, and CD-03 for particulate control, exhausting through Stacks D1, D2, and D3.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 15.20 pounds per hour when operating at a process weight rate of 14,141.6 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.2 Opacity [326 IAC 5-1]

Pursuant to CP 039-4259, issued July 11, 1995, visible emissions from the wood working processes shall be considered in compliance with 326 IAC 6-3-2 in the absence of particulate matter compliance tests provided that visible emissions do not exceed 10% opacity. Compliance with this opacity limit will also satisfy the requirements of 326 IAC 5-1.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1)(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.5 Particulate Matter (PM)

The dust collector for PM control shall be in operation at all times when the woodworking shop is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.7 Parametric Monitoring

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The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse CD-01 shall be maintained within the range of 2.0 and 4.0 inches of water or a range established during the latest stack test; the pressure drop across baghouses CD-02 and CD-03 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.1.8 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the dust collector stack exhaust.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:
  - (1) Weekly records of the Inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected. The Permittee shall maintain records of the results of the inspections required under Condition and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (b) A wood surface coating operation, identified as EU-02, including the following:
- (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
  - (2) One (1) solvent stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack F1;
  - (3) One (1) fan coater application system, identified as FE-4, exhausting through Stack F4;
  - (4) One (1) Paint O'Matic machine using a vacuum coating system, identified as FE-5, exhausting through Stack F5;
  - (5) Two conveyor systems: one (1) conveyor servicing the Paint O'Matic, waterbased stainer, and fancoater, exhausting through Stacks F5 and FC6; the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3;
  - (6) Two (2) UV coaters using vacuum coating systems, identified as FE7 and FE9, exhausting through Stacks F7.1, F7.2, F9.1, F9.2, and F9.3;
  - (7) One (1) waterbased stainer using air-assisted airless spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack F8.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of VOC to all of the surface coating facilities (EU-02) shall be limited to not more than 247 tons per twelve (12) consecutive month period.
- (b) VOC input shall include any clean up solvent. The VOC content of waste shipped offsite may be deducted from the reported monthly VOC usage.
- (c) Compliance shall be demonstrated within 30 days of the end of each month based on the total ton usage for the most recent twelve (12) month period.
- (d) This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. If this permit is relied upon to issue subsequent permits, the limit cannot be relaxed without being reviewed to determine 326 IAC 2-2 and 40 CFR 52.21 applicability.
- (e) This condition replaces Operation Condition 10 from CP 039-4259-00282, issued on July 11, 1995, because:

The original condition stated "Any change or modification which may increase potential emissions to 100 tons VOC per year or 250 tons per year for any of the other criteria pollutants shall obtain an offset or PSD permit, respectively, pursuant to 326 IAC 2-3 or

326 IAC 2-2, respectively, before such change may occur.” This limit was established when Elkhart County was classified as a nonattainment area for ozone. Elkhart County was reclassified in November 1994. The source has requested to have the source wide VOC limit increased to 249 tons per year. There is no change in rule applicability as a result of this increase.

**D.2.2 VHAP Minor Source Limit / Wood Furniture NESHAP [40 CFR 63, Subpart JJ]**

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- (a) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the surface coating facilities (EU-02) shall be limited to not more than 9.4 tons for any individual VHAP per twelve (12) consecutive month period.
- (b) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the surface coating facilities (EU-02) shall be limited to not more than 24 tons for any combination of VHAPs per twelve (12) consecutive month period.
- (c) Compliance shall be demonstrated within thirty (30) days of the end of each month based on the total ton usage for the most recent twelve (12) month period.
- (d) Compliance with this limit makes 40 CFR 63, Subpart JJ (Wood Furniture NESHAP) not applicable to this source.

**D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**D.2.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

---

The PM from each of the coating facilities shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**



**D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)]**

---

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Condition D.2.1 and D.2.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.2.7 Volatile Organic Compounds (VOC)**

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Compliance with the VOC usage limitation contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.2.8 Volatile Hazardous Air Pollutant (VHAP)**

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Compliance with the VHAP usage limitations contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.2.9 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when a spray booth (FE1, FE8) is in operation.

**D.2.10 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (FE1, FE8) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.11 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.2.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents, if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage;
  - (2) The quantity of cleanup solvent shipped out each month, if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.2.2.
- (1) The amount and VHAP content of each finishing material, thinner, clean up solvent, contact adhesive and strippable booth coating material used. Records shall include purchase orders, invoices, and material safety data sheet (MSDS) or Certified Product Data Sheets necessary to verify the type and amount used.
  - (2) The total VHAP usage for each month; and
  - (3) The weight of VHAPs emitted for each compliance period.
- (c) To document compliance with Condition D.2.9 and D.2.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.12 Reporting Requirements: PSD and VHAP Minor Source Limits

- (a) A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

using the reporting forms located at the end of this permit, or the equivalent, within thirty (30) days after the end of the quarter being reported.

- (b) Records used to determine VOC and VHAP use shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) or Certified Product Data Sheets and the date of use.
- (c) A material safety data sheet (MSDS) for each coating and solvent, and any Certified Product Data Sheets necessary for VHAP calculations shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC and VHAP usage. A laboratory analysis of the representative VOC content of the

solvent collected and drummed each quarter for disposal offsite shall be submitted with the quarterly reports, if the VOC content of waste shipped offsite is deducted from the monthly VOC usage. After one year of quarterly analysis, the source may request to have the frequency of analysis changed to annually. Volatile Organic Compound (VOC) is defined in 326 IAC 1-2-90.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) cyclone identified as C3 for particulate control, exhausting through Stack B1.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating) particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall be limited by the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where:  $P_t$  = Pounds of particulate matter emitted per million Btu (lb/MMBTU) heat input;

$Q$  = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facilities permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For  $Q$  less than 10 MMBtu/hr,  $P_t$  shall not exceed 0.6 lb/MMBTU.

#### D.3.2 Opacity Exemption [326 IAC 5-1-3]

Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:

- (a) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period.
- (b) If this facility cannot meet the opacity limitations in (a) of this condition, the Permittee may submit a written request to IDEM, OAM, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.3.4 Testing Requirements [326 IAC 2-7-6(1)(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.5 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the wood fired boiler is in

operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.3.6 Visible Emissions Notations**

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- (a) Daily visible emission notations of the cyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **D.3.7 Cyclone Inspections**

---

An inspection shall be performed each calendar quarter of the cyclone controlling the boiler emissions.

#### **D.3.8 Cyclone Failure Detection**

---

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.3.9 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the dust collector stack exhaust.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of the results of the inspections required under Condition and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Stiles Incorporated  
Source Address: 23551 Cooper Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 1807, Elkhart, IN 46515  
Part 70 Permit No.: T039-7432-00282

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Stiles Incorporated  
Source Address: 23551 Cooper Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 1807, Elkhart, IN 46515  
Part 70 Permit No.: T039-7432-00282

**This form consists of 2 pages**

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|----------------------------|--|
| Check either No. 1 or No.2 |  |
| <b>9</b>                   | 1. This is an emergency as defined in 326 IAC 2-7-1(12)<br><input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<br><input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| <b>9</b>                   | 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)<br><input type="checkbox"/> The Permittee must submit notice in writing within ten <b>(10)</b> calendar days  |

If any of the following are not applicable, mark N/A

|   |
|---|
| Facility/Equipment/Operation:                       |
| Control Equipment:                                  |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation:             |
| Describe the cause of the Emergency/Deviation:      |

If any of the following are not applicable, mark N/A

**Page 2 of 2**

|   |
|---|
| Date/Time Emergency/Deviation started:  |
| Date/Time Emergency/Deviation was corrected:  |
| Was the facility being properly operated at the time of the emergency/deviation?    Y    N<br>Describe:   |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:   |
| Estimated amount of pollutant(s) emitted during emergency/deviation:  |
| Describe the steps taken to mitigate the problem:   |
| Describe the corrective actions/response steps taken:   |
| Describe the measures taken to minimize emissions:  |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
Quarterly Report  
VOC Usage - PSD Minor Limit**

Source Name: Stiles Incorporated  
Source Address: 23551 Cooper Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 1807, Elkhart, IN 46515  
Part 70 Permit No.: T039-7432-00282  
Facility: Surface Coating (EU-02)  
Parameter: VOC  
Limit: Not more than 247 tons per year

YEAR: \_\_\_\_\_

| Month   | Column 1   | Column 2           | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
|         | This Month | Previous 11 Months | 12 Month Total      |
| Month 1 |            |                    |                     |
| Month 2 |            |                    |                     |
| Month 3 |            |                    |                     |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## OFFICE OF AIR MANAGEMENT

### COMPLIANCE DATA SECTION

### PART 70 OPERATING PERMIT

#### Quarterly Report

#### VHAP Usage - Minor Source Limit

Source Name: Stiles Incorporated  
Source Address: 23551 Cooper Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 1807, Elkhart, IN 46515  
Part 70 Permit No.: T039-7432-00282  
Facility: Surface Coating (EU-02)  
Parameter: VHAPs  
Limits: Not more than 9.4 tons for any individual VHAP per twelve (12) consecutive month period.  
Not more than 24 tons for any combination of VHAPs per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

| Month   | Column 1          | Column 2           | Column 1 + Column 2 |
|---------|-------------------|--------------------|---------------------|
|         | This Month        | Previous 11 Months | 12 Month Total      |
| Month 1 | Individual VHAP:  |                    |                     |
|         |                   |                    |                     |
|         |                   |                    |                     |
|         |                   |                    |                     |
|         | Combination VHAPs |                    |                     |
| Month 2 | Individual VHAP:  |                    |                     |
|         |                   |                    |                     |
|         |                   |                    |                     |
|         |                   |                    |                     |
|         | Combination VHAPs |                    |                     |
| Month 3 | Individual VHAP:  |                    |                     |
|         |                   |                    |                     |
|         |                   |                    |                     |
|         |                   |                    |                     |
|         | Combination VHAPs |                    |                     |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Stiles Incorporated  
Source Address: 23551 Cooper Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 1807, Elkhart, IN 46515  
Part 70 Permit No.: T039-7432-00282

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

| <b>Compliance Monitoring Requirement</b><br>(e.g. Permit Condition D.1.3) | <b>Number of Deviations</b> | <b>Date of each Deviation</b> |
|---|-----------------------------|-------------------------------|
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

Indiana Department of Environmental Management  
Office of Air Management

Addendum to the  
Technical Support Document for a Part 70 Operating Permit

|                       |                                       |
|-----------------------|---------------------------------------|
| Source Name:          | Stiles Incorporated                   |
| Source Location:      | 23551 Cooper Drive, Elkhart, IN 46514 |
| Mailing Address:      | P.O. Box 1807, Elkhart, IN 46515      |
| County:               | Elkhart                               |
| SIC Code:             | 2499                                  |
| Operation Permit No.: | T039-7432-00282                       |
| Permit Reviewer:      | Vickie Cordell                        |

On April 30, 1999, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Stiles Incorporated had applied for a Part 70 Operating Permit to operate a wood molding and surface coating operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 2, 1999, Bruce Carter Associates, L.L.C. submitted comments for Stiles Incorporated on the proposed Part 70 permit. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table Of Contents has been modified to reflect these changes.

**Comment 1:**

Section A.1

Please correct the source and mailing addresses here and on the reporting forms as follows:

|                  |                                  |
|------------------|----------------------------------|
| Source Address:  | 23551 Cooper Drive, Elkhart, IN  |
| Mailing Address: | P.O. Box 1807, Elkhart, IN 46515 |

**Response to Comment 1:**

Section A.1 and the reporting forms (Certification, Emergency/Deviation Occurrence, Quarterly Report: VOC usage - PSD Minor Limit, Quarterly Report: VHAP Usage - Minor Source Limit, and Quarterly Compliance Monitoring Report) have been changed as shown below. It is necessary to have the zip code as part of the source address, even though it is no longer the mailing address.

|                  |  |
|------------------|--|
| Source Address:  | <del>57420 CR 3 S</del> <b>23551 Cooper Drive</b> , Elkhart, IN <del>46517</del> <b>46514</b>  |
| Mailing Address: | <del>23551 Cooper Drive</del> <b>P.O. Box 1807</b> , Elkhart, IN <del>46514</del> <b>46515</b> |

**Comment 2:**

Sections A.2 and D.2

Please note the corrections to the emission unit and stack IDs in paragraph A.2(b) below, and corrections to the type of application equipment. Both the vacuum coating and the fan coater systems are non spray application systems. Stacks on the UV lines have been renumbered to account for the stacks exhausting from the ovens. Stack FE7 has been renumbered to F7.1, and F7.2 has been added for the oven. Stack FE9 has been renumbered to F9.1 and two (2) stacks exhausting from the oven on UV line FE9 have been added as F9.2 and F9.3. A stack reference table is enclosed to provide the necessary specifications for these stacks. The wood surface coating operation should be identified as

EU-02, not EU-03 which is assigned to the wood fired boiler. Please make the corrections in Sections A.2, D.2, and where necessary on the reporting forms.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

---

- (b) A wood surface coating operation, identified as ~~EU-03~~ **EU-02**, including the following:
- (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
  - (2) One (1) **solvent** stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack ~~FE4~~ **F1**;
  - (3) One (1) fan coater ~~using airless spray application~~ **system**, identified as FE-4, ~~using dry filters for particulate control~~, exhausting through Stack ~~FE4~~ **F4**;
  - (4) One (1) ~~spray~~ Paint O'Matic ~~booth machine~~ **using air-assisted airless spray application a vacuum coating system**, identified as FE-5, using dry filters for particulate control, exhausting through Stack ~~FE5~~ **F5**;
  - (5) **Two conveyor systems:** One (1) conveyor servicing the Paint O'Matic, **waterbased stainer**, and fancoater, exhausting through Stacks ~~FE and FE6~~ **F5 and FC6**; **the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3**;
  - (6) Two (2) UV coaters ~~using air-assisted airless spray application~~ **vacuum coating systems**, identified as FE7 and FE9, ~~using dry filters for particulate control~~, exhausting through Stacks ~~FE-7 and FE9~~ **F7.1, F.7.2, F9.1, F9.2, and F9.3**;
  - (7) One (1) waterbased stainer ~~using high volume low pressure (HVLP) spray~~ **air-assisted airless spray** application, identified as FE8, using dry filters for particulate control, exhausting through Stack ~~FE8~~ **F8**.

**Response to Comment 2:**

These corrections have been made to Section A.2, as shown in the comment above, and to Conditions D.2.1, D.2.2, D.2.9, D.2.10, and the reporting forms, as shown below. After consulting with Bruce Carter Associates, the dry filter wording was also removed from the description for the Paint O'Matic vacuum coating system, as shown below. Note that the header "**PART 70 OPERATING PERMIT**" has been added to the VOC Usage - PSD Minor Limit Quarterly Report form, this line was inadvertently left out of the draft permit.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

---

- (b) (4) One (1) ~~spray~~ Paint O'Matic ~~booth machine~~ **using air-assisted airless spray application a vacuum coating system**, identified as FE-5, ~~using dry filters for particulate control~~, exhausting through Stack ~~FE5~~ **F5**;

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

---

- (a) The input of VOC to all of the surface coating facilities (~~EU-03~~ **EU-02**) shall be....

D.2.2 VHAP Minor Source Limit / Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

---

- (a) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the surface coating

facilities (~~UE-03~~ **EU-02**) shall be....

- (b) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the surface coating facilities (~~UE-03~~ **EU-02**) shall be....

**D.2.9 Particulate Matter (PM)**

The dry filters for PM control shall be in operation at all times when a spray booth (FE1, ~~FE4~~, ~~FE5~~, ~~FE7~~, FE8, ~~or FE9~~) is in operation.

**D.2.10 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (FE1, ~~FE4~~, ~~FE5~~, ~~FE7~~, FE8, ~~or FE9~~) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

**PART 70 OPERATING PERMIT**

Quarterly Report  
VOC Usage - PSD Minor Limit

Source Name: Stiles Incorporated  
Source Address: 23551 Cooper Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 1807, Elkhart, IN 46515  
Part 70 Permit No.: T039-7432-00282  
Facility: Surface Coating (~~UE-03~~ **EU-02**)

**PART 70 OPERATING PERMIT**

Quarterly Report  
VHAP Usage - Minor Source Limit

Source Name: Stiles Incorporated  
Source Address: 23551 Cooper Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 1807, Elkhart, IN 46515  
Part 70 Permit No.: T039-7432-00282  
Facility: Surface Coating (~~UE-03~~ **EU-02**)

The Stack Summary table from the Technical Support Document (TSD) has been amended as shown below. No change will be made to the TSD. The OAM prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

**Stack Summary**

| Title V Stack ID | Former Stack ID | Operation              | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|------------------|-----------------|------------------------|---------------|-----------------|------------------|------------------|
| F1               | FE1             | Solvent Based Strainer | 21            | 1.5             | 2,100            | ambient          |
| FC2              | FE2             | Conveyor Exhaust       | 22            | 2.0             | 6,555            | ambient          |

|      |     |                        |      |      |       |         |
|------|-----|------------------------|------|------|-------|---------|
| FC3  | FE3 | Conveyor Exhaust       | 22   | 2.0  | 6,555 | ambient |
| F4   | FE4 | Fan Coater             | 21.5 | 1.0  | 1,245 | ambient |
| F5   | FE5 | Paint-O-Matic          | 20.5 | 2.0  | 6,555 | ambient |
| FC6  | FE6 | Conveyor               | 20.5 | 2.0  | 6,555 | ambient |
| F7.1 | FE7 | UV Coater, Vacuum Line | 10   | 0.67 | 890   | 120     |
| F7.2 | N/A | UV Coater, Oven        | 10   | 0.67 | 890   | 87      |
| F8   | New | Water Based Stainer    | 24.5 | 1.33 | 2,110 | ambient |
| F9.1 | N/A | UV Coater, Vacuum Line | 16   | 0.67 | 890   | 106     |
| F9.2 | N/A | UV Coater, Oven        | 20.5 | 1.33 | 1,618 | 85      |
| F9.3 | N/A | UV coater, Oven        | 20.5 | 1.33 | 1,618 | 85      |

**Comment 3:**

Condition D.1.9(b)(1) requires *daily* records while Condition D.1.7 only requires *weekly* static pressure readings. Please change Condition D.1.9(b)(1) to reflect weekly records.

**Response to Comment 3:**

Condition D.1.9(b)(1) has been corrected as shown:

**D.1.9 Record Keeping Requirements**

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:
- (1) ~~Daily~~ **Weekly** records of the Inlet and outlet differential static pressure during normal operation when venting to the atmosphere.

**Comment 4:**

Condition D.2.1(e) omits the complete citation for the last reference to the EPA regulations in 40 CFR.

**Response to Comment 4:**

There is no reference to 40 CFR in D.2.1(e); it is believed that this comment refers to D.2.1(d). Condition D.2.1 (PSD Minor Limit), subpart (d) has been reworded as shown to add the rest of the EPA cite as commented and to better reflect the language of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21.

- (d) This usage limit is required to limit the potential to emit of VOC to less than 250 tons per ~~twelve (12) consecutive month period~~ **year**. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. If this permit ~~has been~~ **is** relied upon to issue subsequent permits, the limit cannot be relaxed without being reviewed pursuant to **determine** 326 IAC 2-2 and 40 CFR **52.21 applicability**.

**Comment 5:**

Please remove the equipment/processes identified as FE4, FE7, and FE9 from Conditions D.2.9 and D.2.10 as these processes are not spray operations. FE4 is a fan coater while FE7 and FE9 are UV coaters using vacuum coating systems.

**Response to Comment 5:**

Conditions D.2.9 (Particulate Matter (PM)) and D.2.10 (Monitoring) have been changed as noted in the

comment. The Paint O'Matic vacuum coating system, FE-5, has also been removed from these conditions.

#### D.2.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when a spray booth (FE1, FE4, FE5, FE7, FE8, ~~or~~ FE9) is in operation.

#### D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (FE1, FE4, FE5, FE7, FE8, ~~or~~ FE9) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### Comments 6 and 8:

Section D.2 requires the source to deduct VOC content in any waste shipped out when determining emissions. Records of the waste shipped out and laboratory analysis of a representative sample are required to be submitted quarterly. These conditions should only be required IF the source chooses to deduct the VOC content of waste shipped out. If the source does not choose to deduct the off site shipment, these conditions should not apply. More specifically, please reword Conditions D.2.1(b) and D.2.12(c) to allow for the option to either deduct the VOC content of the waste shipped out and meet the documentation requirements or to not deduct the VOC content of the waste shipped out and not be required to keep documentation of the amount and analysis of the waste. This change would then be similar to the requirements on dust collection systems with record needed only when exhausting to the atmosphere.

Condition D.2.11(a)(1) requires the source to differentiate between solvent added to coatings and solvent used for cleanup. The applicable rules do not limit solvent usage at this source. Please delete this requirement. (Note: Bruce Carter Associates confirmed that this comment is seeking the same differentiation as Comment 6.)

#### Response to Comments 6 and 8:

Conditions D.2.1(b) (PSD Minor Limit), D.2.11(a)(1) (Record Keeping Requirements), and D.2.12(c) (Reporting Requirements: PSD and VHAP Minor Source Limits), have been changed to further clarify that the source is not required to maintain separate records for solvent used for cleanup and the VOC content of waste solvent shipped offsite unless the source chooses to deduct that VOC from the reported total VOC usage.

**Note:** Because Comments 6, 8, and 9 resulted in changes to some of the same Section D.2 conditions, all of the revisions made in response to Comments 6, 8, and 9 are shown after the Response to Comment 9, below.

#### Comment 7:

Conditions D.2.11 and D.2.12 refer to Conditions D.1.1 and D.1.2 in several places. The correct references should be D.2.1 and D.2.2.

#### Response to Comment 7:



References to Condition numbers have been corrected in Conditions D.2.7, D.2.8, D.2.11, and D.2.12, as shown:

**D.2.7 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC usage limitation contained in Condition D.4.4 **2.1** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.2.8 Volatile Hazardous Air Pollutant (VHAP)**

---

Compliance with the VHAP usage limitations contained in Condition D.4.2 **2.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.2.11 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.4.4 **2.1**, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.4.4 **2.1**.
- (b) To document compliance with Condition D.4.2 **2.2**, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.2 **2.2**.

**D.2.12 Reporting Requirements: PSD and VHAP Minor Source Limits**

---

- (a) A quarterly summary of the information to document compliance with Conditions D.4.4 **2.1** and D.4.2 **2.2** shall be submitted to:

**Comment 9:**

Conditions D.2.11(a)(1) and (b)(1) require Certified Product Data Sheets as part of the record keeping. This source is not subject to 40 CFR 63, Subpart JJ therefore Certified Product Data Sheets should not be required. Please add the phrase "Material Safety Data Sheets (MSDS) or Certified Product Data Sheets" in place of the phrase "Certified Product Data Sheets" in these two conditions. Likewise, Condition D.2.12(c) should require Material Safety Data Sheets (MSDS) **or** Certified Product Data Sheets, not Material Safety Data Sheets (MSDS) **and** Certified Product Data Sheets

**Response to Comment 9:**

Certified Product Data Sheets are tailored to show Hazardous Air Pollutant (HAP) content and frequently do not include data on non-HAP VOCs. Therefore, material safety data sheets (MSDS) have been required in place of Certified Product Data Sheets in Condition D.2.11(a) (Record Keeping Requirements) to show compliance with the VOC limit. The suggested wording was used in revising D.2.11(b) for record keeping of HAPs usage. Condition D.2.12(c) (Reporting Requirements: PSD and VHAP Minor Source Limits) was also modified to reflect these changes.

The following changes were made in Response to Comments 6, 8, and 9:

**D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

---

- (b) VOC input shall include any clean up solvent, ~~minus any VOC solvent shipped out.~~ **The VOC content of waste shipped offsite may be deducted from the reported monthly VOC usage.**

D.2.11 Record Keeping Requirements

---

- (a) (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and ~~Certified Product Data Sheets~~ **material safety data sheets (MSDS)** to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents, **if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage;**
- (2) The quantity of cleanup solvent shipped out each month, **if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage;**
- (b) (1) The amount and VHAP content of each finishing material, thinner, clean up solvent, contact adhesive and strippable booth coating material used. Records shall include purchase orders, invoices, and **material safety data sheets (MSDS) or Certified Product Data Sheets** necessary to verify the type and amount used.

D.2.12 Reporting Requirements: PSD and VHAP Minor Source Limits

---

- (c) A material safety data sheet (MSDS) ~~and a Certified Product Data Sheet~~ for each coating and solvent, **and any Certified Product Data Sheets necessary for VHAP calculations** shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC and VHAP usage. A laboratory analysis of the representative VOC content of the solvent collected and drummed each quarter for disposal offsite shall be submitted with the quarterly reports, **if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage.** After one year of quarterly analysis, the source may request to have the frequency of analysis changed to annually. Volatile Organic Compound (VOC) is defined in 326 IAC 1-2-90.

**Comment 10:**

Section D.2 limits the surface coating operations, EU-02, to *less than* 247 tons of VOC per twelve (12) consecutive month period. Other VOC emissions identified in the TSD amounted to 1.1 TPY for the wood fired boiler and 0.1 TPY for the natural gas heaters. The total of these activities is 248.2 TPY, 1.8 TPY less than the PSD threshold of 250 TPY. Based on this difference, the surface coating operations, EU-02, should be limited **to** 247 TPY and not limited to **less than** 247 TPY. Please make the necessary corrections in Section D.2 and on the reporting forms.

**Response to Comment 10:**

To clarify that the VOC usage for the surface coating operations may go up to 247 tons per year, the wording has been altered to "not more than 247 tons per year" in Condition D.2.1(a)(PSD Minor Limit) and the VOC Usage - PSD Minor Limit quarterly report form. For consistency, Condition D.2.2 (a)and (b) (VHAP Minor Source Limit / Wood Furniture NESHAP)and the respective report form have been

reworded in the same manner.

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of VOC to all of the surface coating facilities (EU-02) shall be limited to ~~less~~ **not more** than 247 tons per twelve (12) consecutive month period.
- (c) Compliance shall be demonstrated within 30 days of the end of each month based on the total ton usage for the most recent twelve (12) month period. ~~This VOC usage limitation is equivalent to VOC emissions of less than 247 tons per twelve (12) month total, rolled on a monthly basis.~~

D.2.2 VHAP Minor Source Limit / Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the surface coating facilities (EU-02) shall be limited to ~~less~~ **not more** than 9.4 tons for any individual VHAP per twelve (12) consecutive month period.
- (b) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the surface coating facilities (EU-02) shall be limited to ~~less~~ **not more** than 24 tons for any combination of VHAPs per twelve (12) consecutive month period.
- (c) Compliance shall be demonstrated within thirty (30) days of the end of each month based on the total ton usage for the most recent twelve (12) month period. ~~This VHAP usage limitation is equivalent to VHAP emissions of less than 9.4 tons for any one VHAP and less than 24 tons for a combination of VHAPs per twelve (12) month total, rolled on a monthly basis.~~

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. Noncompliance with conditions that are not federally enforceable may not constitute a violation of the Clean Air Act. Therefore, IDEM has made the following change to subsection (a) of Condition B.9.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:
2. There are currently no certifications that would be required that would not need to be certified by the responsible official. Therefore, some of the wording in Condition B.10(a) (Certification) was determined to be unnecessary and has been deleted from the condition. In addition, IDEM has added another applicable rule cite.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] **[326 IAC 2-7-5(3)(C)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit~~, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
3. OAM has decided that although IDEM has the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification. Therefore, this requirement is being deleted from Condition B.11(Annual Compliance Certification).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
  - ~~(5) Any insignificant activity that has been added without a permit revision; and~~
  - ~~(6)~~**(5)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

4. A rule cite has been updated in Condition B.22 (Operational Flexibility).

B.22 Operational Flexibility [326 IAC 2-7-20]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC ~~2-4~~ **2-1.1** has been obtained;

5. In condition B.23 (Construction Permit Requirement), the referenced statute has been repealed. Therefore, this condition has been revised.

B.23 Construction Permit Requirement [326 IAC 2]

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~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A~~  
modification, construction, or reconstruction shall be approved **as if** required by and in accordance with **the applicable provisions of** 326 IAC 2.

6. Condition B.26(b) (Annual Fee Payment) has been changed to better reflect the rule.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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- (b) **Except as provided in 326 IAC 2-7-19(e),** ~~Failure~~ failure to pay may result in administrative enforcement action or revocation of this permit.

7. Condition C.4 (Incineration) has been revised to show that 326 IAC 9-1-2 is not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

8. A new condition has been added to the boiler D section. Condition D.3.2 (Opacity Exemption) specifies the conditions under which the boiler is allowed to exceed the opacity limitations stated in Condition C.2 (Opacity). Subsequent Section D.3 conditions have been renumbered.

**D.3.2 Opacity Exemption [326 IAC 5-1-3]**

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**Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:**

- (a) **When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period.**
- (b) **If this facility cannot meet the opacity limitations in (a) of this condition, the Permittee may submit a written request to IDEM, OAM, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.**
9. IDEM, OAM notes that this source is currently operating as an area source pursuant to the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Upon issuance of the Title V permit, the source will not be a major source for hazardous air pollutants (HAPs) and therefore will not be subject to 40 CFR 63, Subpart JJ. The Title V permit includes a new VHAP limit which restricts the potential to emit of the source to less than 10 tons per year for any individual HAP, and less than 25 tons per year for any combination of HAPs (see Response to Comment 10 above, and Condition D.2.2 (VHAP Minor Source Limit / Wood Furniture NESHAP). The Title V permit for this source contains record keeping and reporting to assure compliance with this limit.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

|                              |  |
|------------------------------|--|
| <b>Source Name:</b>          | <b>Stiles Incorporated</b>                   |
| <b>Source Location:</b>      | <b>23551 Cooper Drive, Elkhart, IN 46514</b> |
| <b>County:</b>               | <b>Elkhart</b>                               |
| <b>SIC Code:</b>             | <b>2499</b>                                  |
| <b>Operation Permit No.:</b> | <b>T039-7432-00282</b>                       |
| <b>Permit Reviewer:</b>      | <b>Vickie Cordell</b>                        |

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Stiles Incorporated relating to a wood molding and surface coating operation.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) A wood milling process, identified as EU-01, equipped with three (3) baghouse dust collectors identified as CD-01, CD-02, and CD-03 for particulate control, exhausting through Stacks D1, D2, and D3.
- (b) A wood surface coating operation, identified as EU-03, including the following:
  - (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
  - (2) One (1) stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack FE1;
  - (3) One (1) fan coater using airless spray application, identified as FE-4, using dry filters for particulate control, exhausting through Stack FE4;
  - (4) One (1) spray Paint O'Matic booth using air-assisted airless spray application, identified as FE-5, using dry filters for particulate control, exhausting through Stack FE5;
  - (5) One (1) conveyor servicing the Paint O'Matic and fancoater, exhausting through Stacks FE and FE6;
  - (6) Two (2) UV coaters using air-assisted airless spray application, identified as FE7 and FE9, using dry filters for particulate control, exhausting through Stacks FE-7 and FE9;
  - (7) One (1) waterbased stainer using high volume low pressure (HVLP) spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack FE8.
- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) cyclone identified as C3 for particulate control, exhausting through Stack B1.

**Notes:** The wood milling operation was originally permitted with 2 baghouses and 2 cyclones for particulate control.

The surface coating operation includes a second, previously unpermitted, UV coater identified as FE9. This is an insignificant activity, therefore, no prior approval was required for construction.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

Five (5) natural gas fired radiant heaters with a combined heat input capacity of 0.03 MMBtu/hr, identified as RE1 through RE5.

**Note:** The previously permitted natural gas fired radiant heaters are insignificant activities for Title V; however, they were taken into account when establishing the source-wide VOC limit.

- (b) Exposure chambers (towers, columns), for curing of ultraviolet inks and ultra-violet coating where heat is the intended discharge.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, CP 039-4259-00282, issued on July 11, 1995.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

CP 039-4259-00282, issued on July 11, 1995, Operation Condition 10:

That records of the surface coating quantities and organic solvent content shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Management. Any change or modification which may increase potential emissions to 100 tons VOC per year or 250 tons per year for any of the other criteria pollutants shall obtain an offset or PSD permit, respectively, pursuant to 326 IAC 2-3 or 326 IAC 2-2, respectively, before such change may occur.

Reason not incorporated:

This limit was established when Elkhart County was classified as a nonattainment area for ozone. Elkhart County was reclassified in November 1994. The source has requested to have the source wide VOC limit increased to 249 tons per year. This will maintain the minor source status while allowing increased flexibility in operations. There is no change in rule applicability as a result of

this increase.

The revised condition is included in this TSD under State Rule Applicability - Individual Facilities - Surface Coating, and in the Title V permit as Condition D.2.1.

### Stack Summary

Information for previously unpermitted UV Coater, identified as FE9:

| Stack ID | Operation | Height<br>(feet) | Diameter<br>(feet) | Flow Rate<br>(acfm) | Temperature<br>(°F) |
|----------|-----------|------------------|--------------------|---------------------|---------------------|
| FE9      | UV coater | 30               | 0.67               | 6,555               | ambient             |

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 10, 1996. Additional information was received on May 23, 1997, and March 20, 1998.

A notice of completeness letter was mailed to the source on December 20, 1996.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5.)

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."



| Pollutant       | Potential to Emit (tons/year) |
|-----------------|-------------------------------|
| PM              | greater than 250              |
| PM-10           | greater than 250              |
| SO <sub>2</sub> | less than 100                 |
| VOC             | greater than 250              |
| CO              | less than 100                 |
| NO <sub>x</sub> | less than 100                 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's                        | Potential to Emit (tons/year) |
|------------------------------|-------------------------------|
| Bis(2-ethylhexyl) phthalate  | less than 10                  |
| Glycol Ethers                | greater than 10               |
| Methyl Alcohol               | greater than 10               |
| Methyl Ethyl Ketone (MEK)    | greater than 10               |
| Methyl Isobutyl Ketone (MIK) | greater than 10               |
| Toluene                      | greater than 10               |
| Trichloroethylene (TCE)      | less than 10                  |
| Xylene                       | greater than 10               |
| TOTAL                        | greater than 25               |

Note: Only HAPs with potential to emit of one (1) ton per year or more are listed.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and of PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data, except the HAP emissions which are 1996 data.

| Pollutant       | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM              | 38.1                         |
| PM-10           | 36.9                         |
| SO <sub>2</sub> | 0.2                          |
| VOC             | 37.0                         |
| CO              | 5.2                          |
| NO <sub>x</sub> | 0.9                          |
| Glycol Ethers   | 2.5                          |
| Toluene         | 2.2                          |
| Xylenes         | 2.4                          |

Note: Only HAPs with actual emissions of one (1) ton per year or more are listed.

#### Limited Potential to Emit / Source Status

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

|                        | Limited Potential to Emit (tons/year) |       |                 |                  |      |                 |                 |
|------------------------|---------------------------------------|-------|-----------------|------------------|------|-----------------|-----------------|
| Process/facility       | PM                                    | PM-10 | SO <sub>2</sub> | VOC              | CO   | NO <sub>x</sub> | HAPs            |
| surface coating        | 61.8                                  | 61.8  | 0.00            | 247.0            | 0.00 | 0.00            | 24.0            |
| woodworking *          | 66.6                                  | 66.6  | 0.00            | 0.00             | 0.00 | 0.00            | 0.00            |
| wood fired boiler      | 6.88                                  | 0.0   | 0.12            | 1.10             | 3.13 | 0.53            | 0.00            |
| natural gas combustion | 0.01                                  | 0.01  | 0.00            | 0.10             | 0.11 | 0.13            | 0.00            |
| Total Emissions        | 135.3                                 | 128.4 | 0.1             | less than<br>250 | 3.2  | 0.7             | less than<br>25 |

\* PM from this process is limited by 326 IAC 6-3 (Process Operations). PM-10 is not directly limited by any rule. However, there is no condensible PM-10 from the woodworking operations; all the PM-10 is filterable and therefore would be considered PM pursuant to 326 IAC 6-3.

This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### County Attainment Status

The source is located in Elkhart County.

| Pollutant       | Status      |
|-----------------|-------------|
| PM-10           | attainment  |
| SO <sub>2</sub> | attainment  |
| NO <sub>2</sub> | attainment  |
| Ozone           | maintenance |
| CO              | attainment  |
| Lead            | attainment  |

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment (maintenance) or unclassifiable for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12; 40 CFR Part 60) applicable to this source. The wood fired boiler is not subject to the requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because:
  - (1) The sulfur dioxide requirements do not apply to boilers fired by wood only.
  - (2) The particulate matter requirements only apply to boilers with a capacity greater than or equal to 30 MMBtu/hr. The total wood boiler capacity for the source is 2.9 MMBtu/hr.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 12; 40 CFR Part 63) applicable to this source. This source is not subject to the requirements of 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), because the source has elected to take a limit of less than 10 tons per year for a single hazardous air pollutant (HAP) and less than 25 tons per year for a combination of HAPs. Therefore, the source is not a major source for HAPs and Subpart JJ does not apply.

### State Rule Applicability - Entire Source

#### 326 IAC 1-7 (Stack Height Provisions)

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart county and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in

this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### Woodworking Facilities

##### **326 IAC 6-3 (Particulate Matter (PM))**

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 15.20 pounds per hour when operating at a process weight rate of 14,141.6 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

The baghouse dust collectors shall be in operation at all times the woodworking equipment is in operation, in order to comply with this limit. Compliance calculations for the woodworking operations are shown on TSD Appendix A page 5.

##### **326 IAC 5-1 (Opacity)**

Pursuant to CP 039-4259, issued July 11, 1995, visible emissions from the wood working processes shall be considered in compliance with 326 IAC 6-3-2 in the absence of particulate matter compliance tests provided that visible emissions do not exceed 10% opacity. Compliance with this opacity limit will also satisfy the requirements of 326 IAC 5-1.

#### Surface Coating Facilities

##### **326 IAC 2-2; 40 CFR 52.21 (PSD Minor Limit)**

- (a) The input of VOC to all of the surface coating facilities (EU-03) shall be limited to less than 247 tons per twelve (12) consecutive month period.
- (b) VOC input shall include any clean up solvent, minus any VOC solvent shipped out.
- (c) Compliance shall be demonstrated within 30 days of the end of each month based on the total ton usage for the most recent twelve (12) month period. This VOC usage limitation is equivalent to VOC emissions of less than 247 tons per twelve (12) month total, rolled on a monthly basis.
- (d) This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. If this permit has been relied upon to issue subsequent permits, the limit cannot be relaxed without being reviewed pursuant to 326 IAC 2-2 and 40 CFR.

- (e) This condition replaces Operation Condition 10 from CP 039-4259-00282, issued on July 11, 1995, because:

The original condition stated "Any change or modification which may increase potential emissions to 100 tons VOC per year or 250 tons per year for any of the other criteria pollutants shall obtain an offset or PSD permit, respectively, pursuant to 326 IAC 2-3 or 326 IAC 2-2, respectively, before such change may occur." This limit was established when Elkhart County was classified as a nonattainment area for ozone. Elkhart County was reclassified in November 1994. The source has requested to have the source wide VOC limit increased to 249 tons per year. There is no change in rule applicability as a result of this increase.

326 IAC 12; 40 CFR 63, Subpart JJ (VHAP Minor Source Limit / Wood Furniture NESHAP)

- (a) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the existing and new surface coating facilities shall be limited to less than 9.4 tons for any individual VHAP per twelve (12) consecutive month period.
- (b) The input of Volatile Hazardous Air Pollutants (VHAPs) to all of the existing and new surface coating facilities shall be limited to less than 24 tons for any combination of VHAPs per twelve (12) consecutive month period.
- (c) Compliance shall be demonstrated within thirty (30) days of the end of each month based on the total ton usage for the most recent twelve (12) month period. This VHAP usage limitation is equivalent to VHAP emissions of less than 9.4 tons for any one VHAP and less than 24 tons for a combination of VHAPs per twelve (12) month total, rolled on a monthly basis.
- (d) Compliance with this limit makes 40 CFR 63, Subpart JJ (Wood Furniture NESHAP) not applicable to this source.

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c)(Process Operation), the allowable PM emission rate from each of the paint areas and booths, and from each of the woodworking operations, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

The dry filters shall be in operation at all times the surface coating is in operation, in order to comply with this limit.

#### Wood Fired Boiler

##### 326 IAC 6-2-4 (Particulate Matter Limitation (PM))

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall be limited by the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where:  $P_t$  = Pounds of particulate matter emitted per million Btu (lb/MMBTU) heat input;

$Q$  = Total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facilities permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For  $Q$  less than 10 MMBtu/hr,  $P_t$  shall not exceed 0.6 lb/MMBTU.

#### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The woodworking facilities have applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emission notations of the dust collector stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (f) The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse CD-01 shall be maintained within the range of 2.0 and 4.0 inches of water or a range established during the latest stack test; the pressure drop across baghouses CD-02 and CD-03 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

- (g) In the event that bag failure has been observed:
  - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
  - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- 2. The surface coating facilities have applicable compliance monitoring conditions as specified below:

- (a) The dry filters for PM control shall be in operation at all times when a spray booth (FE1, FE4, FE5, FE7, FE8, or FE9) is in operation.

- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (FE1, FE4, FE5, FE7, FE8, or FE9) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- 3. The wood fired boiler has applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emission notations of the cyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (f) An inspection shall be performed each calendar quarter of the cyclone controlling the boiler emissions.
  - (g) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
  - (g) In the event that cyclone failure has been observed:



- (1) The affected cyclone will be shut down immediately until the failed unit has been repaired or replaced.
- (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

These monitoring conditions are necessary because the dust collectors, dry filters, and cyclone must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (TSD Appendix A page 2).

### **Conclusion**

The operation of this manufactured housing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-7432-00282**.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Stiles Incorporated  
**Address City IN Zip:** 23551 Cooper Drive, Elkhart, IN 46514  
**Permit No/Pit ID:** T039-7432-00282  
**Reviewer:** Vickie Cordell  
**Date:** March 19, 1999

| Booth ID / Material   | Material            | Density (Lb/Gal)* | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential ton/yr | lb VOC /gal solids | Transfer Efficiency |
|-----------------------|---------------------|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------|-----------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|------------------------------|--------------------|---------------------|
| UV Vacuum Coater      | 437-5010            | 9.33              | 0.00%                              | 0.00%          | 0.00%             | 0.00%          | 100.00%                   | 0.0010000             | 2500.0              | 0.00  | 0.00                             | 0.00                          | 0.00                         | 0.00                        | 2.04                         | 0.00               | 98%                 |
| Fancoater             | Special Lacquer     | 7.50              | 76.77%                             | 0%             | 76.77%            | 0%             | 16.75%                    | 0.00200               | 1800.0              | 5.76  | 5.76                             | 20.73                         | 497.47                       | 90.79                       | 13.74                        | 34.37              | 50%                 |
|                       | Poly Solve EB       | 7.51              | 100.00%                            | 0%             | 100.00%           | 0%             | 0.00%                     | 0.00003               | 1800.0              | 7.51  | 7.51                             | 0.41                          | 9.73                         | 1.78                        | 0.00                         | ERR                | 50%                 |
| Waterbase Stainer     | Lacquer             | 7.41              | 70.18%                             | 0%             | 70.18%            | 0%             | 22.96%                    | 0.00300               | 1500.0              | 5.20  | 5.20                             | 23.40                         | 561.64                       | 102.50                      | 13.07                        | 22.65              | 70%                 |
| Paint O'Matic         | Waterbase Stain 169 | 9.09              | 78.62%                             | 70%            | 8.40%             | 75%            | 15%                       | 0.00100               | 3200.0              | 3.08  | 0.76                             | 2.44                          | 58.61                        | 10.70                       | 2.72                         | n/a                | 90%                 |
|                       | Old 138             | 8.67              | 90.09%                             | 81%            | 9.06%             | 83%            | 7%                        | 0.00100               | 3200.0              | 4.57  | 0.79                             | 2.51                          | 60.35                        | 11.01                       | 1.20                         | n/a                | 90%                 |
| Solvent Based Stainer | WS3133              | 7.04              | 99.74%                             | 0%             | 99.74%            | 0%             | 0%                        | 0.00200               | 1800.0              | 7.02  | 7.02                             | 25.28                         | 606.67                       | 110.72                      | 0.14                         | n/a                | 50%                 |
|                       | Super White II      | 7.58              | 49.47%                             | 0.00%          | 49.47%            | 0.00%          | 22.33%                    | 0.00200               | 1800.0              | 3.75  | 3.75                             | 13.50                         | 324.00                       | 59.13                       | 30.20                        | 16.79              | 50%                 |
|                       | WS3144              | 7.91              | 84.99%                             | 5%             | 79.88%            | 2%             | 7.25%                     | 0.00200               | 1800.0              | 6.48  | 6.32                             | 22.75                         | 545.94                       | 99.63                       | 9.36                         | 87.19              | 50%                 |
|                       | WS3254              | 6.75              | 95.27%                             | 0%             | 95.27%            | 0%             | 3.64%                     | 0.00200               | 1800.0              | 6.43  | 6.43                             | 23.15                         | 555.59                       | 101.40                      | 2.52                         | 176.61             | 50%                 |
| Cleaning Solvents     | TCE                 | 12.20             | 10.00%                             | 0%             | 10.00%            | 0%             | 0.00%                     | 0.0000043             | 5000.0              | 1.22  | 1.22                             | 0.03                          | 0.63                         | 0.11                        | 0.00                         | ERR                | 100%                |
|                       | S-0105              | 6.59              | 100.00%                            | 0%             | 100.00%           | 0%             | 0.00%                     | 0.0002700             | 5000.0              | 6.59  | 6.59                             | 8.90                          | 213.52                       | 38.97                       | 0.00                         | ERR                | 100%                |

**State Potential Emissions**

**Add worst case coating (highlighted values) to all solvents**

**81.26      1950.01      355.88      61.77**

**METHODOLOGY**

\* All materials "as supplied".

HVLP spray guns for waterbase stainer; air assisted airless for fancoater and solvent based stainer; air assisted airless with overspray 80% controlled for Paint O'Matic.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

### HAP Emission Calculations

**Company Name:** Stiles Incorporated  
**Plant Location:** 23551 Cooper Drive, Elkhart, IN 46514  
**County:** Elkhart  
**Permit No. / Plt ID:** T039-7432-00282  
**Permit Reviewer:** Vickie Cordell  
**Date:** March 21. 1999

| Material             | Stack<br>TV Id/<br>prior CP Id | Density*<br>(Lb/Gal) | Gal of Mat<br>(gal/unit) | Maximum<br>(unit/hour) | Weight % in material                |         |         |        |        |                              |                   |                 |                   | Potential Emissions (ton/yr)        |      |         |        |       |       |                   |                 |                   | Total State<br>Potential<br>Emissions<br>from Each<br>Material<br>(ton/yr) |
|----------------------|--------------------------------|----------------------|--------------------------|------------------------|-------------------------------------|---------|---------|--------|--------|------------------------------|-------------------|-----------------|-------------------|-------------------------------------|------|---------|--------|-------|-------|-------------------|-----------------|-------------------|--|
|                      |                                |                      |                          |                        | Bis(2-ethyl<br>-hexyl)<br>phthalate | TCE     | Toluene | Xylene | MEK    | Methyl<br>Isobutyl<br>Ketone | Methyl<br>Alcohol | Glycol<br>Ether | Form-<br>aldehyde | Bis(2-ethyl<br>-hexyl)<br>phthalate | TCE  | Toluene | Xylene | MEK   | MIK   | Methyl<br>Alcohol | Glycol<br>Ether | Form-<br>aldehyde |  |
| UV 437-50100         | F7/FE7                         | 9.33                 | 0.0010000                | 2500                   |                                     |         |         |        |        |                              |                   |                 | 0.02%             |                                     |      |         |        |       |       |                   |                 | 0.02              | 0.02   |
| UV 437-50100         | F9 (new)                       | 9.33                 | 0.0010000                | 2500                   |                                     |         |         |        |        |                              |                   |                 | 0.02%             |                                     |      |         |        |       |       |                   |                 | 0.02              | 0.02   |
| Fancoater Lacquer    | F4/FE4                         | 7.50                 | 0.0020000                | 1800                   |                                     |         | 9.06%   | 15.77% |        |                              |                   | 2.35%           |                   |                                     |      | 11.90   | 20.72  | 0.00  | 0.00  | 0.00              | 3.09            | 0.00              | 35.71  |
| Fancoater Retarder   | F4/FE4                         | 7.51                 | 0.0000300                | 1800                   |                                     |         |         |        |        |                              |                   | 100.00%         |                   |                                     |      | 0.00    | 0.00   | 0.00  | 0.00  | 0.00              | 1.81            | 0.00              | 1.81   |
| Waterbase Lacquer    | F8/FE8                         | 7.41                 | 0.0030000                | 1500                   | 3.00%                               |         | 13.00%  |        | 10.00% | 4.00%                        |                   | 6.00%           |                   | 4.87                                |      | 21.10   | 0.00   | 16.23 | 6.49  | 0.00              | 9.74            | 0.00              | 53.56  |
| Waterbase Stain      | F5/FE5                         | 9.09                 | 0.0010000                | 3200                   |                                     |         |         |        |        |                              |                   |                 |                   |                                     |      | 0.00    | 0.00   | 0.00  | 0.00  | 0.00              | 0.00            | 0.00              | 0.00   |
| Old WS-2006 Stain    | F5/FE5                         | 8.67                 | 0.0010000                | 3200                   |                                     |         |         |        |        |                              |                   | 8.46%           |                   |                                     |      | 0.00    | 0.00   | 0.00  | 0.00  | 0.00              | 10.28           | 0.00              | 10.28  |
| Solvent base Stain   | F1/FE1                         | 7.04                 | 0.0020000                | 1800                   |                                     |         |         |        |        |                              |                   |                 |                   |                                     |      | 0.00    | 0.00   | 0.00  | 0.00  | 0.00              | 0.00            | 0.00              | 0.00   |
| Super White II Stain | F1/FE1                         | 7.58                 | 0.0020000                | 1800                   |                                     |         |         | 3.43%  | 8.03%  | 3.87%                        |                   |                 |                   |                                     |      | 0.00    | 5.82   | 13.63 | 4.63  | 0.00              | 0.00            | 0.00              | 24.08  |
| 6-WS3144 Stain       | F1/FE1                         | 7.91                 | 0.0020000                | 1800                   |                                     |         | 50.00%  |        |        | 8.00%                        |                   |                 |                   |                                     |      | 69.33   | 0.00   | 0.00  | 11.09 | 0.00              | 0.00            | 0.00              | 80.42  |
| 6-WS3254 Stain       | F1/FE1                         | 6.75                 | 0.0020000                | 1800                   |                                     |         |         |        |        |                              | 93.00%            |                 |                   |                                     |      | 0.00    | 0.00   | 0.00  | 0.00  | 109.94            | 0.00            | 0.00              | 109.94   |
| TCE                  |                                | 12.2                 | 0.0000043                | 5000                   |                                     | 100.00% |         |        |        |                              |                   |                 |                   |                                     | 1.15 | 0.00    | 0.00   | 0.00  | 0.00  | 0.00              | 0.00            | 0.00              |  |

Total State Potential Emissions: Sum of worst-case coating (highlighted values) for each facility and any solvents.

4.87 0.15 102.33 26.54 29.86 17.58 109.94 24.92 0.04

211.34  
Maximum  
Total HAPs

#### METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

\* All materials "as supplied" (same as "as applied" for these materials).

**Appendix A: Emission Calculations**  
**Wood Fired Boiler**  
**MM Btu/hr 0.3 - < 10**

**Company Name:** Stiles Incorporated  
**Address City IN Zip:** 23551 Cooper Drive, Elkhart, IN 46514  
**CP / Plt ID:** T039-7432-00282  
**Reviewer:** V. Cordell  
**Date:** October 4, 1998

|                                 |                                    |   |
|---------------------------------|------------------------------------|---|
| Heat Input Capacity<br>MMBtu/hr | Heating Value of Wood<br>MMBtu/ton | Potential Throughput<br>tons of wood/yr |
|---------------------------------|------------------------------------|---|

|      |       |         |
|------|-------|---------|
| 2.90 | 16.24 | 1564.29 |
|------|-------|---------|

| Emission Factor in lb/ton of wood* | Pollutant |       |       |       |       |        |
|------------------------------------|-----------|-------|-------|-------|-------|--------|
|                                    | PM        | PM10  | SO2   | NOx   | VOC   | CO     |
|                                    | 8.800     | ND    | 0.150 | 0.680 | 1.400 | 4.000  |
| Potential Emission in lbs/day      | 37.714    | 0.000 | 0.643 | 2.914 | 6.000 | 17.143 |
| Potential Emission in tons/yr      | 6.883     | 0.000 | 0.117 | 0.532 | 1.095 | 3.129  |

**Methodology**

MMBtu = 1,000,000 Btu

Potential Throughput = Heat Input Capacity (MMBtu/hr) x 8760 hrs/yr / Heating Value of Wood (MMBtu/ton)

Emission Factors from Stiles Incorporated 1996 Emission Inventory.

Emission (tons/yr) = Throughput (tons of wood/yr) x Emission Factor (lb/ton)/2,000 lb/ton

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MM Btu/hr 0.3 - < 100**

Page 4 of 5 TSD App A

**Company Name:** Stiles Incorporated  
**Address City IN Zip:** 23551 Cooper Drive, Elkhart, IN 46514  
**CP/Plt ID #:** T039-7432-00282  
**Reviewer:** Vickie Cordell  
**Date:** March 19, 1999

Heat Input Capacity\*  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.3

2.6

**Pollutant**

| Emission Factor in lb/MMCF       | PM<br>7.6 | PM10<br>7.6 | SO2<br>0.6 | NOx<br>100.0 | VOC<br>5.5 | CO<br>84.0 |
|----------------------------------|-----------|-------------|------------|--------------|------------|------------|
| Potential Emission in pounds/day | 0.05      | 0.05        | 0.00       | 0.72         | 0.04       | 0.60       |
| Potential Emission in tons/yr    | 0.010     | 0.010       | 0.001      | 0.131        | 0.007      | 0.110      |

**Methodology**

\*Estimated worst case combined capacity of all existing natural gas combustion facilities at the source, including those that are considered insignificant activities for Title V. The VOC limit for the surface coating was determined by subtracting all potential non-coating VOC emissions from the total source VOC limit.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low NOx Burner = 50, Flue gas recirculation = 32

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, and 1.4-2, as amended 3/98

Emission (pounds/day) = Throughput (MMCF/yr) / 8760 hrs/yr x Emission Factor (lb/MMCF) x 24 hrs/day

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

# Appendix A: Emissions Calculations Woodworking Particulate

Company Name: Stiles Incorporated  
Sawmill Address City IN Zip: 23551 Cooper Drive, Elkhart, IN 46514  
Permit No./Plt ID: T039-7432-00282  
Reviewer: Vickie Cordell  
Date: March 22, 1998

## From permit application:

|                              |                 |  |                          |
|------------------------------|-----------------|--|--------------------------|
| amount of lumber cut:        | 14,141.6 lbs/hr |  |                          |
| amount of sawdust generated: | 1185.67 lbs/hr* | <b>Maximum potential emissions before control:</b> | <b>5,193 tons/yr PM*</b> |
| PM-10 fraction of sawdust:   | 3.89%           | 5,668.5 tons/yr x 0.0389 =                         | <b>202 tons/yr PM-10</b> |

## PM Emissions after control:\*\*

|                                |  |                        |   |                      |
|--------------------------------|--|------------------------|---|----------------------|
| Baghouse dust collector CD-01: | 34,635 acfm x 0.03 grains/acf / 7000 grains/lb x 60 m/hr = | 8.906 lb PM/hr;        | = | 39.009 tons/yr       |
| Baghouse dust collector CD-02: | 15,000 acfm x 0.03 grains/acf / 7000 grains/lb x 60 m/hr = | 3.857 lb PM/hr;        | = | 16.894 tons/yr       |
| Baghouse dust collector CD-03: | 6,500 acfm x 0.03 grains/acf / 7000 grains/lb x 60 m/hr =  | <u>1.671 lb PM/hr;</u> | = | <u>7.321 tons/yr</u> |

**TOTAL EMISSIONS FROM SAWMILL, AFTER CONTROL: 14.435 lb PM/hr 63.224 tons/yr**

## Allowable PM Emissions:

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from the sawmill was calculated with the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

$$E = 4.10 (14,141.6 \text{ lbs/hr} / 2000 \text{ tons/lb})^{0.67} = 15.20 \text{ lbs PM/hr; } = 66.59 \text{ tons PM/yr ALLOWABLE EMISSIONS}$$

## METHODOLOGY

\* No PM emission rate was specified in the application. Therefore, all sawdust reported was presumed to be PM for the uncontrolled PM calculations. The ratio of pounds of sawdust per hour to pounds of lumber cut per hour was taken from the 1995 construction permit application package (CP 039-4259), rather than from the Title V permit application. The Title V application indicated that the sawdust generated equaled 25% of the lumber cut each hour; this is not realistic. Information presented for the Air Pollution Control Board in 1995 stated that 19,281.5 pounds per hour of raw lumber was processed under normal operation and 1,625 pounds per hour of sawdust was estimated to be generated.

\*\* The outlet grain loading specified in CP 039-4259 was used, rather than the values provided in the Title V application; the application values are believed to be inlet grain loading specifications.

Emissions (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs = Annual emissions (tons/yr)